

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

NATALIE REESER,

Plaintiff,

Hon. George Caram Steeh

Case No.: 2:14-cv-11916

v.

HENRY FORD HOSPITAL,

Defendant.

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**DEFENDANT'S REPLY BRIEF IN SUPPORT OF EMERGENCY MOTION TO
EXTEND THE DISPOSITIVE MOTION CUT-OFF DATE**

Defendant is merely seeking a **FOUR** day extension of the Dispositive Motion Cutoff Date, which along with other Scheduling Order dates had been previously extended. In fact, Defendant previously agreed to Plaintiff's request to extend the Scheduling Order dates. The refusal by a member of the Bar of this Court to agree to Defendant's reasonable minor request violates the Eastern District's Civility Principles:

We will agree to reasonable requests for extensions of time and for waiver of procedural formalities, recognizing that it is the attorney, and not the client, who has the sole discretion to determine the accommodations to be granted opposing counsel in all matters not materially or adversely affecting the client's legitimate rights. We will affirm that in such matters no client has a right to demand that his or her counsel shall be illiberal or that we do anything therein repugnant to our own sense of honor and propriety.

United States District Court for the Eastern District of Michigan Civility Principles, Paragraph 17 (Adopted by this Court pursuant to Administrative Order No. 08-AO-009).

Plaintiff's counsel not only refused the request but in response to Defendant's Motion filed 100 pages. In his Response, (while indicating he consulted with his client as to the request) Plaintiff's counsel fails to indicate in any way how Plaintiff would be prejudiced by stipulating to the requested extension, but instead makes numerous assertions that have nothing to do with the request.

Wherefore, Defendant requests that its Motion to Extend Dispositive Motion Cutoff Date be granted.

Respectfully submitted

VARNUM LLP

Dated: May 7, 2015

By: /s/ Terrence J. Miglio
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CERTIFICATE OF SERVICE

I hereby certify that on May 7, 2015, I caused the foregoing document to be electronically filed with the Clerk of the Court using the ECF System, which will send notification of such filing to all Counsel of record.

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